

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:
ROBERT J. WALDRON, JR.,
Debtor

CASE NO. 17-16763-ELF
CHAPTER 13

CITIZENS BANK, N.A.,
Movant

Hearing Date: 3/31/2020
Hearing Time: 9:30 a.m.

REQUEST FOR ADMISSIONS

Pursuant to F.R.C.P. 36, Movant hereby requests the following admissions of the Respondent:

1. The Respondent/Debtor, has failed to make the post-petition payments that were due to Movant on the dates listed below and in the amounts listed below:
 - (b) One (1) monthly post-petition partial payment of \$1,231.05, due on 1/16/2018.
 - (c) One (1) monthly post-petition payment of \$1,224.50, due on 2/16/2018.
 - (d) One (1) monthly post-petition payment of \$1,216.01, due on 3/16/2018.
 - (e) One (1) monthly post-petition payment of \$1,253.80, due on 4/16/2018.
 - (f) One (1) monthly post-petition payment of \$1,240.65, due on 5/16/2018.
 - (g) One (1) monthly post-petition payment of \$1,285.25, due on 6/16/2018.
 - (h) One (1) monthly post-petition payment of \$1,271.08, due on 7/16/2018.
 - (i) One (1) monthly post-petition payment of \$1,285.25, due on 8/16/2018.
 - (j) One (1) monthly post-petition payment of \$1,316.70, due on 9/16/2018.
 - (k) One (1) monthly post-petition payment of \$1,301.52, due on 10/16/2018.
 - (l) One (1) monthly post-petition payment of \$1,316.69, due on 11/16/2018.
 - (m) One (1) monthly post-petition payment of \$1,331.95, due on 12/16/2018.
 - (n) One (1) monthly post-petition payment of \$1,348.15, due on 1/16/2019.
 - (o) One (1) monthly post-petition payment of \$1,348.14, due on 2/16/2019.
 - (p) One (1) monthly post-petition payment of \$1,327.97, due on 3/16/2019.
 - (q) One (1) monthly post-petition payment of \$1,379.59, due on 4/16/2019.
 - (r) One (1) monthly post-petition payment of \$1,362.39, due on 5/16/2019.
 - (s) One (1) monthly post-petition payment of \$1,379.59, due on 6/16/2019.

- (t) One (1) monthly post-petition payment of \$1,362.38, due on 7/16/2019.
- (u) One (1) monthly post-petition payment of \$1,379.59, due on 8/16/2019.
- (v) One (1) monthly post-petition payment of \$1,379.59, due on 9/16/2019.
- (w) One (1) monthly post-petition payment of \$1,362.39, due on 10/16/2019.
- (x) One (1) monthly post-petition payment of \$1,348.14, due on 11/16/2019.
- (y) One (1) monthly post-petition payment of \$1,301.52, due on 12/16/2019.
- (z) One (1) monthly post-petition payment of \$1,285.25, due on 1/16/2020.
- (aa) One (1) monthly post-petition payment of \$1,284.47, due on 2/16/2020.

Respectfully Submitted

/s/ Nathalie Paul

Nathalie Paul, PA Bar No. 309118

Weltman, Weinberg & Reis Co., L.P.A.

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